

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION**

JESSICA HODGES, as natural guardian of )  
Minor children, LMC and DLC; ESTATE )  
OF LEE MICHAEL CREELY by and )  
Through Warren Ratchford, its )  
Administrator, )

Plaintiffs, )

v. )

Civil Action No. 4:22-cv-00067

CHATHAM COUNTY, GEORGIA; )  
CORRECTHEALTH LLC; )  
CORRECTHEALTH CHATHAM, LLC; )  
CARLO MUSSO, M.D.; KAREN )  
FORCHETTE; ALFRED NEVELS; )  
SELENA CARDONA; TEANNA )  
FRANCES-HENDERSON; TERENCE )  
JACKSON; DON WHITE; KARLOS )  
MANNING; YVETTE BETHEL- )  
QUINNEY; LOWRETTA FLORENCE; )  
AMBER ANDERSON; JACKIE HARNED; )  
SUSAN RIVERA; and LOUIKISHA )  
ROBERTS, )

Defendants. )

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**DEFENDANTS CARDONA, JACKSON, FRANCES-HENDERSON, AND BETHEL-  
QUINNEY'S AMENDED ANSWER**

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Selena Cardona, Terence Jackson, Teanna Frances-Henderson, and Yvette Bethel-Quinney, Defendants in the above-referenced matter, by and through undersigned counsel, file this, their Amended Answer to Plaintiffs' Complaint, by adding an affirmative defense, as follows:

**SIXTEENTH DEFENSE**

Plaintiffs' claims are barred in whole or in part by Lee Michael Creely's assumption of the risk of injury.

Respectfully submitted this 27<sup>th</sup> day of July, 2022.

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